

CONSULTING PROJECT
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PRESENTENCE MEMORANDUM

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

-against-

Agron Zenelaj
Docket No: 0207 1:11CR00486 (S-I)-056

HONORABLE DORA L. IRIZARRY

Respectfully submitted,

Stephen Kaplan, Ph.D
Forensic Psychologist

Elba Torres, LMSW
Mitigation Specialist
CONSULTING PROJECT

George Sheinberg, Esq.
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DEFENSE COUNSEL

September 13, 2013

CONTENTS

INTRODUCTION.....Pg. 3

PSYCHO-SOCIAL BACKGROUND.....Pg. 7

EVALUATION & RECOMMENDATION.....Pg. 10

EXHIBITS.....Pg. 15

LIST OF EXHIBITS

Exhibit A – Character Letters:

- 1. Vjollca Zenelaj-Wife
- 2. Mirdita Djonbalaj-Sister
- 3. Merita Zenelaj-Sister
- 4. Ardita Rugova- Sister
- 5. Sultane Zenelli-Sister
- 6. Sulltan Zenelaj- Brother

Exhibit B- Pictures Depicting Family

INTRODUCTION:

This presentence memorandum has been prepared by the Consulting Project, a private mitigation and forensic social work firm that assists defense attorneys with evaluations of individual clients and cases with a view toward presenting alternative pleas and sentencing possibilities to the Court and the United States Attorney's Office. The Project has presented memoranda in a number of courts including Federal Courts in the Southern and Eastern Districts of New York, New York State Supreme Courts and New York State Family Courts.

Our staff is comprised of Licensed Clinical Social Workers, Forensic Mental Health Specialists and Forensic Psychologists as consultants. We understand and consider all the interests involved, including the safety of the community, and offer options that will ideally reduce recidivism and provide adequate treatment.

This presentence memorandum is submitted on behalf of Agron Zenelaj, age 34, at the request of his attorney, George Sheinberg. Mr. Zenelaj stands before the Court awaiting sentence after entering a plea of guilty on June 10, 2013. The purpose of this report is to present relevant psychosocial information to be taken into consideration in the Court's sentencing deliberations.

The Consulting Project believes that Agron Zenelaj's psycho-social history and present mental health status are mitigating circumstances, which do not excuse his actions, but do however provide an explanation of how Mr. Zenelaj came to commit the instant offense and predict what will be the impact of his sentence on his mental health and his family.

This memorandum will highlight the following mitigating factors that we respectfully recommend in considering a downward departure:

1. Mr. Zenelaj experienced displacement from his childhood home and separation from family as a result of events preceding the Kosovo War;
2. was the victim of physical abuse and persecution by Serbian police due to his ethnicity;
3. struggled to obtain an education due to political conflicts in Kosovo;
4. became the provider and protector of his family at the age of fourteen;
5. dealt with untreated mental health symptoms stemming from his traumatic past;
6. and became involved with the conspiracy due to naiveté and financial distress.
7. Mr. Zenelaj has been presently diagnosed with Major Depressive Disorder and his mental health will be impacted by any period of incarceration.

The information in this memorandum is based on two in-depth clinical interviews and one psychological evaluation with Mr. Zenelaj. We also interviewed his mother, father and wife in their home and his siblings over their telephone. Additionally, we reviewed the presentence investigation report and the appended letters from his family.

In our meetings, Mr. Zenelaj was forthcoming about the underlying causes of his arrest and repeatedly expressed remorse and regret for his actions to us and to his family (see Character Reference Letters). He understands the magnitude of the choices he made and how these decisions may now cost him his freedom and time away from his family. However, his actions from the time of his arrest to the present demonstrate a desire to make amends. Thus, Mr.

Zenelaj complied with all of his release conditions during his term of pretrial supervision, he pled guilty and accepted responsibility on June 10, 2013, and continues to adhere to the directives of the United States Pretrial Services office to date. He has maintained his employment in order to continue providing financially for his three children, Edita, age ten, Mirlinda, age 7, and Shkelqim, age 6. Mr. Zenelaj is grateful for the opportunity to truly enjoy the unyielding love and support of his family and friends.

We acknowledge the seriousness of the charges that Mr. Zenelaj has pled guilty to and we do not intend to minimize the gravity of these charges with our recommendations. The Consulting Project respectfully recommends that this Court consider a number of factors highlighted in our report before determining a just disposition. The factors we wish the Court to consider are:

- We believe Mr. Zenelaj struggled with intense feelings of anxiety, constant fear, and panic due to his traumatic past.
- Is presently exhibiting symptoms of depression and anxiety, due to the potential of being separated from his children and wife. Based on a psychological evaluation we have determined that his present diagnosis is Major Depressive Disorder.
- Mr. Zenelaj's family, specifically his young children, who are in significant developmental stages, will be permanently impacted by his incarceration.

Mr. Zenelaj's history presents mitigating circumstances, which although they do not excuse his actions, provide an explanation regarding the instant offense and potential impact of his sentence. We believe the factors presented demonstrate the defendant endured childhood

circumstances to a substantial degree that when taken together make his case an exceptional one (*See Policy Statement 5K2.0 (c) Departures Based on Multiple Circumstances*).

Regardless of these difficulties, Mr. Zenelaj also exhibited many strengths throughout his life. He maintained his employment, was heavily involved in the care of his children and continually provided them with support, love and guidance. This substantiates the potential for rapid rehabilitation and prevention of recidivism. The Consulting Project does not consider Mr. Zenelaj to be malicious in character. He is highly motivated to make change and has shown his capacity to be a responsible, hard-working, and dedicated individual. All of the family members interviewed for the purpose of this report including his mother, Mejemer Zenelaj, his father, Mehmet Zenelaj, his wife, Vjollca Sahitaj, and his siblings Sultan, Sultane, and Mirdat can attest to his hardworking and responsible nature (*see character letters attached as Exhibit A*).

With the continued support of his family, the necessary mental health services that will address his active depression and traumatic past, and by maintaining his employment we believe Mr. Zenelaj is capable of reclaiming his life. Incarceration will only serve to disrupt the stable foundation his family has and his financial support of those that depend on him and will not provide the opportunity to address those issues that have seriously impacted his life in the past.

Therefore, the Consulting Project respectfully requests the Court consider these factors as mitigating and impose a sentence with a minimum of imprisonment and a maximum of community-based treatment and supervision. We believe this sentence is sufficient but not greater than necessary to fulfill the purposes of sentencing. This will provide the opportunity for mental health treatment, supervision, guidance or assistance Mr. Zenelaj may need to understand his actions and gain accountability for any future behavior. We believe this sentence is a reasonable, effective means by which Mr. Zenelaj may avoid future contact with the criminal

justice system and continue to be a productive member of society and father to his three children.

PSYCHO-SOCIAL BACKGROUND:

Agron Zenelaj was born on November 3, 1978 to Mehmet and Mejemer Zenelaj in Jablonica, a village located in western Kosovo. Mr. Zenelaj was the second child born to this union. His siblings include Mirdat Djonbalaj, age 37, Ardita Rugova, age 33, Sulltan Zenelaj, age 32, Sultane Bajrami, age 29, and Merita Zenelaj, age 22. The family worked as farmers and lived a relatively stable, uneventful home life until their country was torn apart by warfare. Political tensions between the Serbian and Albanian population created constant turmoil. When Mr. Zenalaj was fourteen years old, his father was forced to flee the family home. He learned the police intended on arresting him for speaking out against communism and he fled out of fear of being killed. Two weeks after his departure, his mother sent his siblings, Mirdat, Ardita, Sultan, and Sultane, to live with their uncle, Beqir. She fled to her sister's home in Germany with Mr. Zenalaj and Merita, her youngest child. Her sister, Tusha, was able to obtain passports and visas for them to travel to the United States. In 1993, Mr. Zenalaj travelled to the United States with his mother and sister and settled in Bronx, New York. His father joined them a year and a half later followed by his three siblings who arrived in the United States a year after their father. All were granted political asylum, have obtained legal status and are gainfully employed. Mr. Zenelaj currently resides in Yonkers, New York, with his parents, wife and three children. He was arrested on the instant matter on July 13, 2011 and remains at liberty under supervised release by the Pretrial Services Department.

In Jablonica, Mr. Zenelaj attended a village school for Albanian children. Due to longstanding conflicts between Serbians and Albanians, children of Albanian descent were forced to attend segregated schools and eventually their educational system was completely dismantled. As a result, Mr. Zenelaj did not receive a formal education. He was unable to fully engage in school due to the troubled nature of his surroundings. His childhood was marked by persecution for his ethnicity including being beaten by Serbian police as an adolescent on two occasions, being forcefully displaced from his home, having his uncle killed by Serbian police forces, and finally the burning of his childhood home. Unfortunately these tumultuous circumstances were not unfamiliar to his parents who suffered through political strife for most of their lives. They attempted to shield their children from the effects of their surroundings but were unable to fend off the hostile attacks and the eventual loss of life as they knew it.

Mr. Zenalaj describes the day he left his childhood home as a “nightmare.” He was unaware of his father’s whereabouts and suffered over having to leave behind four of his siblings. His mother never worked outside of the home and was unsure how they would survive on their own. With the help of her family, she was able to travel to the United States with Mr. Zenalaj and her youngest, Merita. Upon arrival in the United States, they settled in the Bronx, New York. Mr. Zenalaj soon found work at Dino’s Pizzeria. He worked up to eighty hours a week to support both his mother and little sister. Due to his hefty work schedule, he was unable to return to school. He became the sole breadwinner in the home and carried the burden of being the “man of the house,” a role that far outweighed his emotional maturity and ability to provide. Mr. Zenalaj felt constant anxiety over his ability to fulfill this role and ensure the safety of his mother and sister in his father’s absence. His sister, Sultane, recalls that he was treated as a father figure rather than a brother by his siblings.

Although his father reunited with the family a year and a half later, Mr. Zenelaj maintained his role as breadwinner until his father found steady work as a handyman. Additionally, due to his parent's language barrier, he took on the responsibility of managing the household expenses as well as handling medical, immigration or other business they needed assistance with. His remaining siblings travelled to the United States a year after their father arrived. They were able to take advantage of the educational system and found gainful employment. They married and moved out of the family home while Mr. Zenelaj remained in the home caring for his parents. Despite marrying his wife and having three children with her, he continued to live at home. He admits he could not imagine leaving his parent's side after all they had been through together in the past. He worries they would have an extremely difficult time managing without him in the home. Mr. Zenelaj recognizes this feeling of connection with his parents was forged as a result of their separation and displacement from his home as an adolescent.

With the birth of his children, he felt greater responsibility to maintain his role of provider within the family. He worked two jobs as a doorman and a handyman. Even with this income, Mr. Zenelaj worried about his ability to support his family. He admits financial duress and his sense of responsibility as a father became powerful motivators for his involvement in the drug conspiracy. His desire to protect and care for his loved ones clouded his judgment and contributed directly to the commission of the instant offense. He was formally charged on July 13, 2011 and released on July 15, 2011 on a \$500,000 Secured Appearance Bond. He remains at liberty adhering to Pretrial Services Agency supervision conditions.

EVALUATION & RECOMMENDATION:

In our face-to-face interviews with him, Mr. Zenelaj presented as anxious, shaky and noticeably distraught over the instant charges. He became emotional when describing the issues in his life that may have contributed to his actions. He realizes the harm he has caused to all involved and is deeply remorseful. He is especially distraught over the impact of his arrest on his parents, Mejmer and Mehmet, his wife, Vjollca, and their three children, Edita, Mirlinda, and Shkelqim. His parents have grown to depend on his assistance in the home handling everything from shuttling them to doctor's appointments to grocery shopping. His wife, Vjollca, must now shoulder the responsibility of caring for their children without his assistance. She recently obtained part-time work as a salesclerk but fears she will be unable to manage the family finances without Mr. Zenelaj's contribution. Additionally, she speaks limited English and does not drive further impeding her ability to care for their children in his absence. She admits she has little family support in the United States and would most likely return home to Kosovo to raise their children if Mr. Zenelaj is incarcerated for a lengthy period of time. He fears having them uprooted as he was at a point in their development when stability and the constant presence of primary caregivers is essential.

The impact of parental incarceration on children has been well documented. "Among the problems found among children of imprisoned parents are poor school performance, aggressiveness and 'acting out' behavior, and emotional and interactional problems such as excessive crying and withdrawal."¹ His children have grown accustomed to the stability of their home and their displacement coupled with the loss of a primary caregiver would undoubtedly

¹ Finney-Hairston, Creasie. (1987). Family Ties During Imprisonment Hairston, Journal of Sociology and Social Welfare.

negatively impact their development. The trauma of separation will diminish their ability to establish trust and connection to others throughout their youth and into adulthood. Upon his release from incarceration, in addition to finding work, housing and re-establishing connections to the community, Mr. Zenelaj would also be faced with the task of repairing his relationship with his children. This is a complex process presenting additional stressors for both the parent and the child as they attempt to forge a renewed connection and re-establish roles that might have shifted during the period of incarceration.

Mr. Zenelaj's history presents numerous factors that impacted his personal development and growth. At the age of fourteen, Mr. Zenelaj was forced to separate from his father, his siblings, his extended family and his childhood home as a result of widespread persecution in his homeland. His uncle was murdered and his home was completely destroyed by arson. Upon arrival in the United States, he assumed the role of provider and protector leaving him vulnerable and without the necessary supports essential for his successful transition into young adulthood. The traumatic abuse, victimization, separation and displacement he and his family endured further exacerbated this vulnerability. "The relationship between mental health problems and assaultive violence is strong... 72.2% of community mental health center patients were victims of assault or were family members of homicide victims."² War experiences are associated with substantially increased rates of mental disorders, particularly Post-Traumatic Stress Disorder (PTSD) and Major Depressive Disorder (MD).³

The residents of Kosovo experienced years of segregation, ethnic cleansing, forced separation, displacement, imprisonment and the death of loved ones. Their ability to adjust was

² Kilpatrick, D., & Acierno, R. (2003). Mental health needs of crime victims: epidemiology and outcomes. *Journal Of Traumatic Stress*, 16(2), 119-132.

³ Priebe, S., Bogic, M., Ashcroft, R., Franciskovic, T., Galeazzi, G., Kucukalic, A., & ... Ajdukovic, D. (2010). Experience of human rights violations and subsequent mental disorders – A study following the war in the Balkans. *Social Science & Medicine*, 71(12), 2170-2177. doi:10.1016/j.socscimed.2010.09.029

severely compromised after being uprooted from their homes and many times taken far away from friends and family without knowledge of their whereabouts. Social disruptions that may seem unimaginable in our society deeply impacted the lives of many of the survivors on a daily basis. Recovery from these traumatic events was especially difficult because their support systems were completely destroyed disrupting the process of trauma recovery and increasing the difficulty of building the elements linked to high quality of life.⁴

When discussing his traumatic past, Mr. Zenelaj was initially hesitant to provide detailed information because of the difficulty of disclosing painful events he and his family endured. However, after spending significant time engaged in the interview process he relaxed and was extremely cooperative.

Based on a psychological evaluation Mr. Zenelaj exhibits symptoms of Major Depressive Disorder. He meets criteria for diagnoses of Major Depressive Disorder and Panic Disorder with Agoraphobia. Assessment included comprehensive clinical interview, Structured Clinical Interview for DSM-IV Disorders (SCID-I), and Zung Depression Scale. Mr. Zenelaj reports depressed mood, loss of interest, insomnia, agitation, restlessness, loss of energy, and decline in thinking and concentration. He has been depressed since his arrest and his depression is within the moderate range. He also reports experiencing panic attacks approximately once every two months, includes high level of anxiety with marked physical sensations and fearful thoughts. These panic attacks started soon after his arrest. He exhibits a mild to moderate level of agoraphobia.

⁴ Kashdan, T. B., Morina, N., & Priebe, S. (2009). Post-traumatic stress disorder, social anxiety disorder, and depression in survivors of the Kosovo War: Experiential avoidance as a contributor to distress and quality of life. *Journal Of Anxiety Disorders*, 23(2), 185-196. doi:10.1016/j.janxdis.2008.06.006

Mr. Zenelaj's untreated mental health symptoms have intensified the feelings of impending doom and worry he feels over his current criminal justice involvement. He admits he has trouble sleeping and eating and has begun smoking excessively and drinking daily in order to cope with his emotions. Some of the anxious, dissociative behaviors exhibited by Mr. Zenelaj in our interviews signal symptoms associated with anxiety, including avoidance and hyper-arousal. Avoidance allows the individual to escape thoughts, feelings and places that remind them of the abuse and hyper-arousal causes hyper-vigilance or the need to remain alert in an effort to detect threats to their safety in the environment.⁵

He admits that although he suffered as a result of the war in his country, he did not seek help in managing his anxious feelings because he believed the only way he could move forward was by forgetting his past. His family preferred to bury their memories rather than acknowledge their victimization. However, emotional or psychological trauma left untreated can create a sense of constant worry, stress and instability and lead to various mental health conditions including anxiety and depression, as is evident with Mr. Zenelaj. When the trauma occurs in childhood, the victim is more vulnerable to being re-traumatized and sees the world as a frightening and dangerous place. These fears contributed to Mr. Zenelaj's hesitance to obtain assistance in managing his traumatic past and led to further isolation from social supports. With the necessary parental guidance, social connections and concrete support Mr. Zenelaj was accustomed to, he might have been protected from many of the risky behaviors he engaged in as an adult. Without these protective factors and proper mental treatment the likelihood of

⁵ Kilpatrick, D., & Acierno, R. (2003). Mental health needs of crime victims: epidemiology and outcomes. *Journal Of Traumatic Stress*, 16(2), 119-132.

developing mental health issues that would negatively impact his way of life including his diagnosed depression and can create a potential of Post Traumatic Stress Disorder (PTSD).⁶

We acknowledge the seriousness of the charges that Mr. Zenelaj faces and we do not intend to minimize the gravity of these charges with our recommendations. The Consulting Project therefore respectfully recommends that this Court consider a number of factors that we have discussed in our report before determining a just disposition. Mr. Zenelaj's history presents mitigating circumstances, which although they do not excuse his actions, provide an explanation regarding the instant offense and the impact of his sentence. We believe the factors presented demonstrate the defendant endured childhood circumstances to a substantial degree that when taken together make his case an exceptional one (*See Policy Statement 5K2.0 (c) Departures Based on Multiple Circumstances*).

Regardless of these difficulties, Mr. Zenelaj also exhibited many strengths throughout his life. He maintained his employment, was heavily involved in the care of his children and continually provided them with support, love and guidance. The Consulting Project does not consider Mr. Zenelaj to be malicious in character. Despite his traumatic adolescence and young adulthood he has been able to maintain his employment and provide a loving, nurturing family life for his children. He is highly motivated to make change and has shown his capacity to be a responsible, hard-working, and dedicated individual. All of the family members interviewed for the purpose of this report including his mother, Mejemer, his father, Mehmet, and his wife, Vjollca, can attest to his hardworking and responsible nature. With the continued support of his family, the necessary mental health services that will address his traumatic past, and by maintaining his employment we believe Mr. Zenelaj is capable of reclaiming his life.

⁶ Horton, C. (2003). Protective factors literature review. Early care and education programs and the prevention of child abuse and neglect. Center for the Study of Social Policy.

Incarceration will only serve to disrupt his financial support of those that depend on him and will not provide the opportunity to address those issues that have seriously impacted his life in the past. Mr. Zenelaj's lack of prior criminal justice involvement, his strong family support, his dedicated work ethic, and his efforts toward self-improvement all make it evident that prison is not a necessary requirement to ensure the public's safety. Additionally, any period of incarceration would place an undue burden on his three children whom depend on him for emotional and financial support.

Therefore, the Consulting Project respectfully requests the Court consider these factors as mitigating and impose a sentence with a minimum of imprisonment and a maximum of community-based treatment and supervision. We believe this sentence is sufficient but not greater than necessary to fulfill the purposes of sentencing. This will provide the necessary mental health treatment, supervision, guidance or assistance Mr. Zenelaj may need to avoid further criminal activity. We believe this sentence is a reasonable, effective means by which Mr. Zenelaj may avoid future contact with the criminal justice system and continue to be a productive member of society and father to his three children.

Respectfully Submitted,

A handwritten signature in dark ink, appearing to read "Stephen Kaplan".

Stephen Kaplan, Ph.D
Forensic Psychologist

A handwritten signature in dark ink, appearing to read "Elba L. Torres".

Elba L. Torres, LMSW
Mitigation Specialist

Honorable Judge:

I am Vjollca Zenelaj, Agron's wife. Please government of the United States of America help me and my kids. He is a good husband, a good son and a good dad. He does everything for us. He works night and day. I don't know what I am going to do if it's me without him. The children love him a lot. Sometimes they come to sleep during the night with us. All the time my kids call him on the telephone at work. My daughter calls him all the time. They wait for the days dad is home from work so he can take them to the park and do whatever they want. I have a lot of respect for all the Judges. Please, I have three kids. I need my husband with me and my kids. He is a really good person. I can't eat dinner without him. The kids wait for him to eat together. My life will be shut down, my kid's heart's will be broken. I don't know what I will do. I will be like a dead person without any life in front of my kids. Who will do homework with the kids? They wait for their dad to help them. I don't know enough myself. How will I help them?

Thank you,

Vjollca

8/27/2013

Honorable judge

My name is Mirdita Djonbalaj

I'm 37 years of age and I'm Agron Zenelaj's oldest sister. I work in retail in Macy's for 8 years, as a sales associate in women's fragrance. I'm a hard worker just like my brother Agron. He is an amazing person inside and out and only wants the best for everyone. He was exactly the same as a child, he matured at a young age. He provided for the family when we were back home in kosova. At the time the Serbians took over the country and didn't allow us to do anything comfortably. Agron was beaten for absolutely no reason but only because he was albanian. His childhood was hard he never really had one. As soon as he came to America he was 15 years old and continued to provide for his family. He worked in a pizzeria as a delivery boy. He saved up all the money he had made and sent it back home to my other brother, and sister and me to live. Soon after, my brother, sister and I came to America and got together with my parents, Agron and my 2 younger sisters. We then began to live our daily lives with all of Agron's support. Years later, I got married and Agron got married and everyone else eventually did as well. Agron now has 3 healthy, beautiful kids with his loving wife Vjollca. He is a great father and husband and an amazing family man. My brother does everything he possibly can to see his family happy. Before all this confusion he held two jobs and always made time to have fun with his family and help his kids with whatever they needed. We are all so very close to him and do everything together. Neither one of us could imagine life without him especially my parents. When they took Agron, my dad had a stroke and everyone in the family were so miserable and upset. We can't imagine Agron getting locked up. Just the thought of it breaks my heart. I love my brother truly and dearly. I can't picture my life without him.

Respectfully

Mirdita Djonbalaj

550 mclean ave Ph

Yonkers n.y 10705

914)315-6265

Sulltane Zeneli

08/29/13

Honorable Judge,

My name is Merita Zenelaj I am a homemaker and a mother of two boys Aiden and Adrian Dedinca. I am also the youngest sister of Agron Zenelaj. Agron was not only a big brother to me but more like a father figure, even though I had a father, I most likely went to agron when I needed help with something before anyone else. Agron is my role model, he's all I know from childhood as being the main support system for our family, until my parents got on there feet. I look up to him for so many reasons, but ill just name a few in this letter. He is the most generous, caring, hardworking man I know. From the young age of fourteen until this very day he has kept a job, sometimes even two. He has done everything he can to make our lives a lot easier whether it was teaching us the meaning of hard work, to supporting each and everyone of our decisions. Most importantly Agron is one of the best fathers I know, as I watch him raise his kids I cant help but look back and remember him talking to me the same way he talks to his three beautiful children, it makes me happy because I know those kids are going to grow up into great, smart, caring adults. Agron is not only a great guy in his children's eyes, but in my children's eyes also. He's always there whether it's a birthday party or if a bike needs fixing, he's only a phone call away. my children have grown to look up to him in the same way that I do. I honestly can say that all my nieces and nephews feel this way about there uncle. There are a million great things I can say about my big brother (Agron Zenelaj) but then this letter would never end. To sum him up in a few words would be difficult, but he is very family oriented. He's the strong rope that ties our family together, and not a day goes by that I am not grateful for having him in my life because he has impacted my life in away that no one else can.

Respectfully,
Merita Zenelaj
110-15 71st rd Forest
Hills N.Y 11375 1K
(347) 820-4229

8/27/2013

Honorable judge

Your honor my name is Ardita Rugova I'm a 33 year old female Agroni Zeneli's younger sister and I'm currently employed by Fabios hair studio as a part time hair dresser. At 137 park way road bronxvill New York and have been working there for the past 2 and a half years.

Growing up back home was hard as a young girl having to do a lot of land work to survive. I was with my father because my mother and agron came to America to better our life back home and to help provide for our needs. Although he was only 15 years old he was one of the smartest people I new and he was a mature young man. He worked in a pizza store for a close family friend making minimum wage working 13 hours 7 days a week. He worked to bring us all together as a family so we can reunite again. Soon after agron brought us over and we all reunited. The family was together. Even though my father was a super attendant agron continued to work full time. We all lived together it was 6 children and our mother and father. And the only one working at the time was agron he continued to provide and keep a roof over our head. Soon enough I got married and my parents bought a house and agron and my yonger sisters and his wife moved in with my parents. agron started working two full jobs day and night to help my mother pay some of the bills. Because soon after buying the house my father got laid off. Agron worked so hard that my heart still aches because he never had a fun childhood like other kids and teenagers, instead he worked to keep food on the table and better his children's life's as well as ours. He's an amazing person and words cant even describe the love I have for my older brother and he isn't much older then me but he was always like a father rather then a brother. He's an amazing father to 3 children and a wonderful husband to his wife of 12 years. I no the things agron has done for his family none of us can repay him, but he is an amazing big hearted person, one of a kind.. He's the kind of person that will leave himself behind just so he can help anyone who needs his help. My family and I were blessed to have an amazing not only brother but father figure to. Even though we were blessed with an amazing father to. When this happened with Agron we as a family were destroyed and we all thought it was a really bad nightmare. Agron has never done anything to go against anyone. So this to us was a really bad nightmare and he doesn't deserve any of this. My father took this so hard that when Agron got arrested he suffered 2 strokes with in one year. There isn't one day that goes by that I think to myself what happened? Where did this come from? Agroni situation took a toll on all of us. But in life everyone deserves a second chance because my brother isn't a bad person he's willing to leave his happiness aside to make someone else happy.

Respectfully,
Ardita Rugova
1844 Tenbroeck ave PH
Bronx N.Y 10461
(347)803-9579

8/26/2013

Honorable judge :

Your honor

My name is Sultane Zeneli and I am a 27 year old female I'm one of Agron Zenelaj's Younger sisters. I'm Currently employed by Loreal fragrances my current location is 800 Central Park ave in yonkers n.y Macy's in cross county shopping center.

I'm writing this reference letter about my brother Agron Zenelaj. Agron has always been a father figure in my life because he has been providing for my family since he was 15. The way I have seen it is that he's never really had a teenage life and to be able to enjoy himself because he's always been too busy taking care of us. He's lived with my parents his whole life up to today and cares for them , pay bills, doctors apt, food shopping, translates. He is a great father to his 3 beautiful children and an amazing husband to his wife. At one point he worked 2 full time jobs because my father was laid off just to keep up with the bills because my parents had just bought a house. He's the kind of person that will take his shirt off his back to give it to the needy, the kind of person that will bend over backwards for anyone. My kids are attached to him he takes them to the movies and park plays with them we love him very much words can't explain. We always go on vacation together, he's a very family oriented kind of guy, always what's his family together. He's always been the apple of our eyes my siblings and I have always looked up to him. He has never done anything wrong, or ever went against anyone. If anything he's always tried to help people. It brings tears to my eyes just writing this letter because the way this was set out was as if my brother is a monster and he isn't guilty of anything but trying to help others. This situation has been very hard on all of us especially our parents when agron got arrested my father got really sick and suffered a stroke because we have never been in a situation like this before and we didnt know what to do and how to deal with all of this. So it has taken a toll on all of us. He has never been arrested or charged with anything before he respects the law. Works hard to support his family and helps our parents. He's always there by my parents and his siblings always. When ever I need something he's the man I run to although I have been married for 10 years when my husband and I need him he's always helping us with everything. He's just done so much for us and there isn't a person that can compare to him ever. A wonderful big hearted person always looking to see what good he can do to anyone I love and adore him with all my heart he's my best friend I can't even imagine my life without him.

Respectfully,

Sultane Zeneli
595 mclean ave apt 4f
Yonkers n.y 10705
347)707-3206

Honorable Judge

August 28, 2013

Your Honor,

My name is Sulltan Zenelaj. I am a building superintendent in New York City. I have known Agron Zenelaj for 32 years, which is all of my life, for he is my older brother. As youngsters in Kosovo, we spent every waking moment together. We were inseparable. As an older brother, he always watched out for me and my family. Indeed, as the only males in our family of eight, besides our father, we were forced to grow up all too quickly. A life of deprivation and need produced an overwhelming obligation to work hard to provide for our family. Whether it was riding horses miles to the city in our native home in Kosovo to sell firewood or working side by side selling pizza in a pizzeria in the Bronx, we did everything in our power to help support our parents and our siblings.

As he grew older and started a family of his own, the fear of not being able to provide for our family sustained my brother. He began working two jobs to help provide not only for our aging and ailing parents, who make up an extended family in his household, but also for his wife and three children. Your Honor, it is on behalf of these three children that I appeal to you for leniency. Not only is my brother the primary source of financial support for them, he also has a deep emotional connection with his children. They adore their father and share a very strong bond with him. Without his presence and his guidance, I fear what time apart might do to his relationship with his children and the negative impact it will have on them in every facet of their lives. I struggle to imagine their lives without their father's daily presence: their confusion at his absence, their longing for his hugs, the missed tender moments that create the foundation of a loving relationship and build the memories that make up a life. It is truly too difficult to consider.

Additionally, Your Honor, I am concerned for my brother's well being. I know he is remorseful for his actions and is fully aware that his actions were wrong. He is also cognizant of the pain it is causing his family. Your Honor, I implore you to give him the opportunity to show that he is indeed a positive asset to his family, friends, and society. Please do not allow the mistakes he has made define forever the individual my brother is. His dedication to family expresses his deep commitment and love for his family and his work ethic conveys the type of hardworking individual he is. Agron remains an essential part of our family and I do not want this to change. I love him very much.

In closing, Your Honor, allow me to take this opportunity to express my profound gratitude to you for taking the time to read my letter. I hope it has moved you to consider leniency for my brother. Thank you for your time, consideration, and understanding.

Respectfully,

Sulltan Zenelaj
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